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June 14, 2024

Via ECF:

The Honorable Cathy L. Waldor
United States Magistrate Judge
District of New Jersey
Martin Luther King Jr. Courthouse
50 Walnut St., Courtroom 4C
Newark, NJ 07101

**Re: *Dolores v. United States*
21-CV-765 (KSH)(CLW)**

Your Honor,

My office and Rickner PLLC represent the Plaintiff Jose Dolores in this matter. I write to request an additional extension of time to complete expert discovery, currently scheduled to close on June 27, 2024. Counsel for defendant United States of America, David Inkeles, Esq. of the United States Attorney's Office, has consented to this request and modification of the discovery schedule.

Per the Court's previous order of March 13, 2024 (ECF Docket No. 37), Plaintiff was to serve his affirmative expert report by April 29, defendants were to serve responsive expert reports by May 29, and expert discovery was to be completed by June 27, 2024. Plaintiff has retained a Spanish-speaking expert witness relating to his psychological trauma but working around this expert's schedule for evaluation and follow up has taken longer than anticipated, and we have kept Mr. Inkeles apprised of these delays. To date, Plaintiff's expert has completed the evaluation and—with the Court's permission—we will be serving the expert report on defendants within 10 days, i.e. by June 26, 2024.

As such, the undersigned requests that the expert witness schedule be modified as follows:

- 1) Affirmative expert reports to be served by **June 26, 2024**; responsive expert reports to be served by **July 26, 2024**.

2) Depositions of all expert witnesses to be completed by **August 26, 2024**.

Respectfully Submitted,

/s/
Christopher H. Fitzgerald

CC via ECF:

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SO ORDERED.

s/ Cathy L. Waldor
Hon. Cathy L. Waldor, U.S.M.J.

Date: June 18, 2024